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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AIRMOTIVE INVESTMENTS, LLC, a  
Nevada limited liability company,

Plaintiff,

v.

WELLS FARGO BANK, N.A.; a national  
banking association; DOE individuals I  
through XX; and ROW CORPORATIONS I  
through XX,

Defendants.

Case No. 2:25-cv-00239-APG-EJY

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR WELLS  
FARGO BANK, N.A. TO RESPOND TO  
COMPLAINT**

THIS STIPULATION is entered into by and between Plaintiff Airmotive Investments LLC (“Airmotive”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”, and together with Airmotive, the “Parties”), by and through undersigned counsel, to extend Wells Fargo’s deadline to respond to Airmotive’s Complaint from February 11, 2025 to March 28, 2025 based on the following:

1. On January 9, 2025, Airmotive served Wells Fargo with the Summons and Complaint.

2. On February 4, 2025, Wells Fargo timely removed the Complaint to this Court.  
[ECF No. 1.]

3. Based on the date of removal, Wells Fargo's initial deadline to respond to the Complaint is February 11, 2025.

4. The Parties are actively engaging in early resolution discussions. To allow early resolution discussions to develop prior to incurring unnecessary legal fees, the Parties seek an extension of time for Wells Fargo to respond to the Complaint.

NOW THEREFORE, based on the foregoing and subject to Court approval, the Parties agree as follows:

1. The Parties stipulate and agree to extend the deadline for Wells Fargo to respond to the Complaint, up to and including **March 28, 2025**, to allow the Parties additional time to develop early resolution discussions prior to incurring unnecessary legal fees.

2. This extension request is sought in good faith and is not made for the purpose of delay.

**IT IS SO STIPULATED.**

Dated: February 7, 2025.

Dated: February 7, 2025.

ROGER CROTEAU & ASSOC., LTD.

SNELL & WILMER L.L.P.

By: /s/ Timothy E. Rhoda

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By: /s/ Jennifer B. Lustig

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N.A.*

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: February 7, 2025